EPA

United States Environmental Protection Agency
Washington, D.C. 20460

Water Compliance Inspection Report

Section A: National Data System Coding (i.e. PCS)

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 N 2 5	3 I D G 1 3 2 0 0 4 11	12 1 8 0 3 3 0 17	18 C	19 S	20 3

Remarks

21 NPDES General Aquaculture permit administratively continued by EPA 66

Inspection Work Days	Facility Self-Monitoring Evaluation Rating	BI	QA	Reserved	
67 0 6 0 69	70 3	71 N	72 N	73 74	75 80

Section B: Facility Data

Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)*
Evaqua Farms, Inc. Processing
4074 N 2000 E
Filer, ID 83328

Entry Time/Date	Permit Effective Date
10:20AM 3/30/2018	12/1/2007
Exit Time/Date	**Permit Expiration Date**
12:50PM 3/30/2018	11/30/2012

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Numbers
Jim Henderhan
General Manager
P: 208-326-3100
F: 208-326-5935

Other Facility Data (e.g., SIC, NAICS, and other descriptive information)
SIC = 2092 (Prepared Fresh and Frozen Fish)
NAICS = 311710 (Seafood Product Preparation)

Name, Address of Responsible Official/Title/Phone and Fax Number
Jim Henderhan
P.O. Box AG
Filer, ID 83328
P: 208-326-3100 F: 208-326-5935

Contacted [X] Yes [ ] No

Section C: Areas Evaluated During Inspection (Check only those areas evaluated)

X	Permit	X	Self-Monitoring Program		Pretreatment		MS4
X	**Records/Reports**		Compliance Schedule		Pollution Prevention		
X	Facility Site Review		Laboratory		Storm Water		
X	Effluent/Receiving Waters	X	Operations & Maintenance		Combined Sewer Overflow		
X	Flow Measurement		Sludge Handling/Disposal		Sanitary Sewer Overflow		

Section D: Summary of Findings/Comments

(Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)

SEV Codes | SEV Description

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Phone and Fax Numbers	Date
Craig Thomas	DEQ-TFRO (208)-736-2190 & (208)-736-2194	5/23/18
Tyler Fortunati, REHS	DEQ State Office (208)-373-0140 (208)-373-0576	5/29/18

EPA Form 3560-3 (Rev 1-06) Previous editions are obsolete

ICIS
6/27/18
JM

STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

650 Addison Avenue West, Suite 110 • Twin Falls, Idaho 83301 • (208) 736-2190
www.deq.idaho.gov

C.L. "Butch" Otter, Governor
John H. Tippets, Director

May 30, 2018

Jim Henderhan
General Manager, Evaqua Farms, Inc.
P.O. Box AG
Filer, ID. 83328

Re: Compliance Inspection at Evaqua Farms, Inc. Filer, Idaho NPDES Permit No. IDG132004

Dear Mr. Henderhan:

On March 30, 2018, I, Craig Thomas of the Department of Environmental Quality (DEQ) conducted a compliance inspection of the Evaqua Farms, Inc. processing facility on behalf of EPA. The purpose of this inspection was to determine compliance with the Clean Water Act, specifically compliance with the facility's National Pollutant Discharge Elimination System (NPDES) Permit No. IDG132004

DEQ appreciates the cooperation and assistance you provided during the inspection. A copy of the inspection report has been enclosed for reference. At the time of the inspection, several areas of concern were identified. Please take the corrective actions necessary to address the following concerns:

- Part II.G.3.b of the permit states that "Flow measuring devices or methods used to measure influent and/or effluent flow at each point, calibration procedures, and calculations used to convert to flow units."

  My concern is that the QAP did not contain a calibration procedure for the influent flow meter currently in use.

- Part II.B, Table 2, and Part II.E.1, Table 3, of the permit contain flow-dependent effluent limitations (i.e., BOD_5, TSS, TP, Oil & Grease, and Total Phosphorous) in lbs/day.

  My concern is that the mechanical Sensus flow meter had not been calibrated since installation at the time of the inspection, providing potential inaccurate monitoring results for these parameters.

- Part II.G.3.d of the permit states "QA plan must include qualification and training of personnel."

  My concern is that the QAP did not contain any personnel training record documentation.

Please ensure all aspects of your operation are conducted in accordance with applicable federal, state, and local requirements. The inspection report in its entirety has been submitted to EPA, which retains all rights to pursue enforcement actions to address these concerns and any other violations.

If you have any questions regarding this matter, please contact me at craig.thomas@deq.idaho.gov or (208)-736-2190 or alternatively, Maria Lopez at Lopez.Maria@epa.gov or (208)-378-5616.

Sincerely,

Craig Thomas
Aquaculture Coordinator
IPDES Program, DEQ-TFO

CT:sh

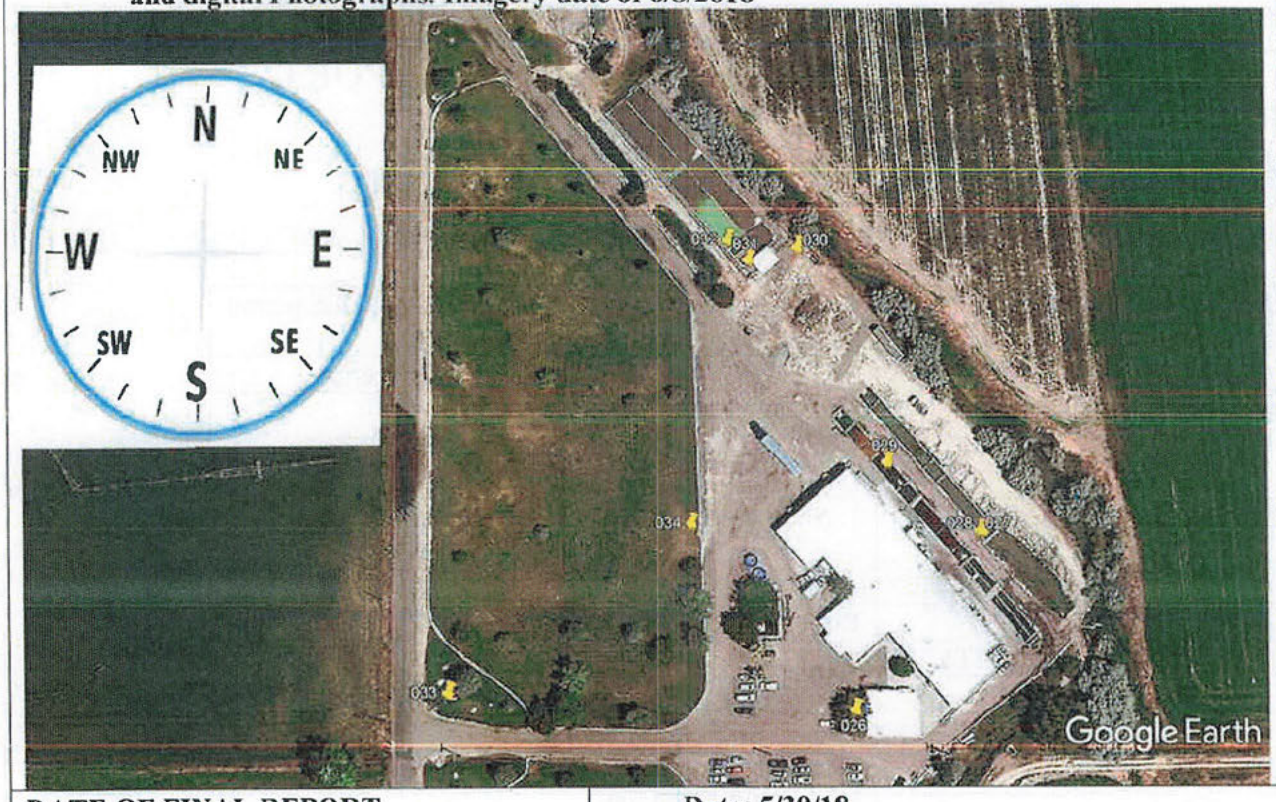
Enclosure (1)

cc: Maria Lopez, EPA-IOO
Tyler Fortunati, DEQ-SO

Idaho Department of Environmental Quality
AQUACULTURE FACILITY INSPECTION REPORT
Evaqua Farms, Inc.-Processing Plant
NPDES Permit Number IDG132004
Effective: December 1, 2007. Expiration: November 30, 2012
NOI Submission: December 16, 2016

PURPOSE OF INSPECTION	Evaluate facility compliance with their NPDES permit and the Clean Water Act.
TYPE OF INSPECTION	Announced Compliance Evaluation Inspection
DATE(s) OF PREVIOUS NPDES INSPECTIONS	Date: **07/31/13** Date: **04/20/10** Date: **08/13/02**
PENDING OR CURRENT ENFORCEMENT ACTIONS (review NOV and warning letters on file)	1. **None were found**
PRIMARY FACILITY NAME	**Evaqua Farms Inc. – Processing Plant**
OTHER NAME(S) USED FOR FACILITY	**None**
NPDES PERMIT #	**IDG132004**
FACILITY CONTACT	Name: **Jim Henderhan** Position: **General Manager** Phone: **208-326-3100** Email: **jim.henderhan@evaquafarms.com**
FACILITY SIZE (annual fish production; affects frequency of monitoring requirements in parentheses). Confirm production and monitoring frequency during the inspection.	**> 500,000 (Annually)**
INSPECTOR(s) AND AFFILIATION Craig Thomas	**Craig Thomas** **Regional Aquaculture Coordinator** **Idaho Department of Environmental Quality** **Twin Falls Regional Office**
DATE OF INSPECTION	Date: **03/30/2018** Arrival Time: **10:20AM** Departure Time: **12:50PM**

Google Earth Map—Evaqua Farms Processing Plant located at 4074 N 2000 E Filer, ID 83328—See Exhibit B & C for complete facility overview, with GPS waypoints and digital Photographs. Imagery date of 6/8/2016



DATE OF FINAL REPORT	**Date: 5/30/18**

ENTRY AND PERMIT CONDITIONS REVIEW

This was an announced inspection. I left a voice message for Jim Henderhan on March 1, 2018 to schedule this inspection. On March 5, 2018 Mr. Henderhan returned my telephone call and we set up a tentative inspection date of March 21, 2018 at 10:00 AM. I contacted Mr. Henderhan by email requesting a new inspection date because the inspector (b) (6) on March 21st. We rescheduled for March 30, 2018 at 10:30 AM.

I arrived at the facility at 10:20 AM and met Mr. Henderhan, General Manager, Phillip Henderson, Technical Services Manager, and Gary Almgrem, Director of Engineering, at the Evaqua Farms, Inc. office. The processing plant is at the same site location as the office. The facility is owned and operated by Evaqua Farms, Inc. After introductory pleasantries, I presented my credentials and discussed the purpose of the visit. Access to the facility was not denied.

A document review commenced, then an on-site inspection and an exit interview where areas of concern were presented, and a review of what to expect from DEQ following the completion and submission of the inspection report to EPA. The three areas of concern outlined are:

- Part II.G.3.b of the permit states "flow measuring devices or methods used to measure influent and/or effluent flow at each point, calibration procedures, and calculations used to convert to flow units."

  The QAP was missing a calibration procedure for the influent flow meter.

- Part II.B, Table 2, and Part II.E.1, Table 3, of the permit contain flow-dependent effluent limitations (i.e., BOD_5, TSS, TP, Oil & Grease, and Total Phosphorous) in lbs/day.

  The mechanical Sensus flow meter had not been calibrated since installation at the time of the inspection, providing potential inaccurate monitoring results for these parameters.

- Part II.G.3.d of the permit states "QA plan must include the following, qualification and training of personnel"

  The QAP did not contain any training records for personnel.

Once back at the DEQ office a few days after the inspection, I noticed that I did not take a picture of the facility's land application site. On April 2, 2018, I contacted Mr. Henderhan by email to come back to the facility to take a couple more photographs. On April 5, 2018 I was able to get the additional photograph documentation for this report.

OPENING CONFERENCE	
1. Explain the purpose of the inspection and how the inspection will proceed.	Remarks: **Completed**
2. Review the issuance and expiration dates of the facility's NPDES permit.	Remarks: **Completed**
3. Explain the NOI and the date of submission prior to the expiration date of the permit (June 3, 2012 – 180 days prior to expiration).	Remarks: **Completed**
4. Explain that the inspection will involve a review of the DMRs, QA Plan, BMP Plan, most recent NOI, Receiving Water Monitoring Report, & Annual Report.	Remarks: **Completed**
5. Explain that the inspection will involve a site tour/visit of the facility.	Remarks: **Completed**
6. Are all necessary personnel present for the inspection?	Remarks: **Yes**
7. Will any chemicals or hazardous chemicals be encountered during the site tour/visit?	Remarks: **No**
8. Does the permittee have any questions before proceeding with the inspection?	Remarks: **No**

PRELIMINARY QUESTIONS	
1. Obtain representative's name, position, and phone number.	Name: **Jim Henderhan** Position: **General Manager** Phone: **(208) 326-3100** Email: jim.henderhan@evaquafarms.com
2. How long has the representative worked for the company?	**Since 2016, for Evaqua Farms, Inc.**
3. How long has he/she held the position?	**Since 2016**
4. Other representative(s) present for the inspection.	Name: **Gary Almgren** Position: **Director of Engineering** Phone: **(208) 326-3100** Email: gary.almgren@evaquafarms.com Name: **Phillip Henderson** Position: **Technical Services Manger** Phone: **208-326-3100** Email: phillip.henderson@evaquafarms.com

NOTICE OF INTENT (NOI)	
NOI Review: Show the interviewee the NOI, and ask him/her to review it for errors. If errors are found, ask him/her to correct the errors and initial the corrections. A new NOI should be submitted if several corrections are made.	
1. What is the date of the most recently submitted NOI?	**12/16/2016**
2. Is the NOI complete and current?	**Yes**
3. Have any structural changes been made to the facility recently?	**No**
4. Any structural changes anticipated? (Plan and Spec review required of DEQ, if so; see page 47; Part VI.I.2.)	**No**
FACILITY LOCATION, ETC. (see NOI)	Address: **4074 N 2000 E** **Filer, ID 83328** Phone: **(208) 837-6541** Fax: **(208) 837-9102** Email: jim.henderhan@evaquafarms.com
OWNER NAME	**Evaqua Farms, Inc.**
OWNER ADDRESS	Address: **P.O. Box AG** **Filer, ID. 83328** Phone Number: **208-326-3100** Fax: **(208) 326-5935** E-mail: **jim.henderhan@evaquafarms.com**
OPERATOR NAME	**Evaqua Farms**
OPERATOR ADDRESS	Address: **P.O. Box AG** **Filer, ID 83328** Phone Number: **(208) 326-3100** Fax **(208) 326-5935** E-mail: **jim.henderhan@evaquafarms.com**
PERMIT TRANSFERS 1. Is this a new operator?	**Yes** – The operator changed from SeaPac of Idaho, Inc. to Evaqua Farms, Inc. effective January 1, 2017.
If new, review the following: According to VII. I. "Transfers. Authorization to discharge under this permit may be automatically transferred to a new permittee on the date specified in the agreement only if: 1. The current permittee notifies the Director of the Office of Water and Watersheds at least 30 days in advance of the proposed transfer date; 2. The notice includes a written agreement between the existing and new permittees containing a specific date for transfer of permit responsibility and liability between them; and 3. The Director does not notify the existing permittee and the new permittees of its intent to revoke and reissue the authorization to discharge.	
2. Was EPA and DEQ notified in writing of the transfer?	**Yes.- A letter was received December 1, 2016-copy of letter is included in Appendix B of this report.**
LOCATION OF FACILITY Previous GPS: Latitude: **42° 35' 22.76" N** Longitude: **-114° 39' 5.60" W** Date: **None stated** Time: **None stated**	GPS taken at entrance to facility: Latitude: **N 42.58947764** Longitude: **W -114.6529575** Date: **3/30/2018** Time: **12:43**
	Google Earth GPS at entrance to facility: Latitude: **N 42.589365** Longitude: **W -114.652963** Elevation: **3695 feet** Date: **06/08/2016**

AUTHORIZATION TO DISCHARGE	
1. Did you receive a letter authorizing you to discharge, if necessary?	**Not Applicable**
2. "Addressee" on the authorization to discharge letter: 3. Is this correct?	Name: **N/A** **N/A**
4. Do you have a copy of the permit?	**Yes**
5. Is the facility currently discharging?	**Yes**
6. Was the facility containing, growing or holding fish on December 1, 2007 (effective date of the permit)?	**Yes**
7. If not currently discharging, when do you expect to rear fish again at this facility?	**N/A**-Fish rearing does not occur on-site. This is a processing facility.
8. [II.B.1.]Do you plan to participate in Pollutant Trading?	**Yes** – Mr. Henderhan indicated that Pollutant Trading could be a future option.

PROHIBITED DISCHARGES	
Part II.C.. Review the prohibited discharges 1 (a-h) with the interviewee.	**COMPLETED**
1. Have you had any such prohibited discharges that you know of since December 1, 2007?	**No.**
2. Do you expect to have any difficulty prohibiting such discharges from this facility?	**No**

PROHIBITED PRACTICES	
Part II.D.. Review the prohibited practices 1 - 3 with the interviewee.	**COMPLETED**
1. Have you or any other employee engaged in any of these prohibited practices that you know of since December 1, 2007?	**No**
2. Do you expect to have any difficulty prohibiting such practices at this facility?	**No**

DMR - FACILITY MONITORING REQUIREMENTS	
Part II.E. Ask to see the recent DMRs and raw data. Review to determine if the permittee is filling in the correct data (influent, effluent raw data, and effluent net). See II.E.3.b., for requirement when data are less than MDL. According to II. E., "The permittee must monitor discharges from all outfalls authorized under the permit as specified in Table 3…" For frequency requirements, see footnotes 2 & 3 of Table 3	
1. When was the last monitoring event?	Mr. Henderson stated that the last monitoring event took place on 03/07/18.
2. Who conducted the monitoring?	Mr. Henderson
3. Is this the person who usually conducts the monitoring?	**Yes**
4. Who fills out the DMRs?	Mr. Henderson stated that he usually fills out the DMRs.
5. When was the most recent DMR submitted to EPA and DEQ?	Mr. Henderson stated the most recent DMR submitted to EPA and DEQ was on 03/19/18.
6. [II.E.1.] Do you monitor discharges from all outfalls authorized under this permit as specified in Table 12 (p 31) (Raceways and FFSBs) and Table 13 (p 32) (OLSBs)?	**Yes**
7. [II.E.3.a.] Do you use methods that can achieve MDLs less than or equal to those specified in Table 5?	**Yes**

8. [II.E.3.b.] For purposes of reporting on the DMR, do you comply with Appendix D?	**Yes**
9. Influent Water Sources	
a. How many influent sources?	Mr. Henderhan stated that one well provides the water for the processing plant.
b. Are all influent sources monitored for flow?	**Yes** – By a Sensus serial #54464090 mechanical flow meter.
c. Are all influent sources monitored for WQ parameters?	**Yes**
d. Are all influent sources combined into one sample to determine flow and/or WQ parameters?	**Yes**
10. Limitations and Monitoring Requirements [II.A-G]	
a. [II.E] Timing: Are all effluent samples and flow measurements taken on the same day?	**Yes**
b. [II.E] Timing: If your facility has multiple effluent discharge points and/or influent points, do you composite samples from all points proportionally to their respective flow?	**N/A**
c. [II.E.2] Location: Are effluent samples from the effluent stream collected just prior to discharge into the receiving waters?	**Yes**
d. [II.E.2] Location: If the effluent stream mixes with other flows, do you collect effluent samples from the effluent stream just prior to discharge into receiving waters?	**N/A**
e. [II.D.3.c.] Small discharges: Does the facility have small discharges that comprise less than 1% of the total raceway flows?	**No**
f. [II.D.3.c.] Small discharges: Are the flows of these small discharges monitored at a minimum of once per year?	**N/A**
g. [Table 5, Footnote 5] What is the interval of discrete sampling for the composite sample? (The permit requires four or more discrete samples taken at one-half hour intervals or greater in a 24 hour period.)	Mr. Henderhan stated that a sample is taken at least 30 minutes apart, four times throughout a 24 hour period at the discharge.
h. How and where is flow measured for the treatment system? And by whom?	Mr. Henderhan stated that he calculates flow using a mechanical flow meter, Sensus 54464090, located before the pipeline enters the processing building.
i. [Table 3, Footnote 4] Is this flow measurement method one of those specified in Appendix E.?	**Yes**
j. [Table 3, Footnote 2] Is flow measurement taken concurrently with each pollutant sampling, when applicable, once for every composite sample?	**Yes** — Mr. Henderhan stated that the flow measurement is recorded daily by reading the flow meter dial, and he performs a visual inspection for changes in water flow.
11. How is the flow measuring device calibrated? And by whom?	Mr. Henderhan stated that flow measurement device is not calibrated.

RECEIVING WATER MONITORING	
Part II.F., . According to II.F.1., "All permittees must monitor for those parameters listed in Table 4 quarterly upstream from the outfall. See Table 4. This requirement applies whether or not the facility is discharging." Ask to see the QA Plan which will describe where the samples are taken in the receiving stream.	
1. [II.F.1.] Is the facility monitoring receiving water for ammonia nitrogen as N, pH, and temperature upstream from the outfall?	**Yes**
2. [II.F.2.] Are receiving water samples grab samples and are they collected during the time when effluent composite samples are being collected for the same parameters?	**Yes**
3. [II.F.3.] Are receiving water samples analyzed using EPA approved methods capable of achieving method detection limits (MDLs) that are equivalent to or less than those listed in Table 15 (Permit, p 34)?	**Yes**
4. [II.F.5.] Are you submitting the results to EPA and DEQ with the DMRs?	**Yes**
5. [II.F.5.] Are receiving water monitoring results submitted to EPA with copies to DEQ with the DMRs for the month when the monitoring is conducted? Does the DMR report include all information required in Part V.E. and a summary and evaluation of the analytical results, including a short discussion of the accuracy and precision of the data, any problems with sample collection or analysis that may have affected the results, or what conditions existed at the time of the sample collection that may be relevant to how representative the data may be of the normal conditions at that site?	**Yes** **Yes**
6. [II.F.6.] Is quality assurance/quality control plans (QA/QC plans) for all the monitoring, documented in the QA Plan required under Part II.G (Quality Assurance Plan)?	**Yes**

QUALITY ASSURANCE PLAN (QA PLAN)	
Part II.G.. According to II.G. "The permittee must develop a QA plan for all monitoring required by this permit. The plan must be developed and implemented within 60 days of coverage under this permit."	
1. [II.G.] Do you have a QA plan?	**Yes**
2. [II.G.] When did you submit the certification (Appendix F) that a plan has been developed and is being implemented?	Mr. Henderhan stated that the certification was submitted on 01/1/2017.
3. [II.G.1.] Is the QA Plan designed to assist in planning for the collection and analysis of effluent and receiving water samples in support of the permit and in explaining data anomalies when they occur?	**Yes**
4. [II.G.2.] During all sample collection and analysis activities, does the permittee use the EPA-approved quality assurance and quality control (QA/QC) and chain-of-custody procedures described in EPA/QA/R-5 and EPA/QA/G-5?	**Yes**
5. [II.G.2.] Is the QA Plan prepared in the format that is specified in EPA/QA/R-5 and EPA/QA/G-5?	**No**

6. [II.G.3.a)] Does the QA Plan include: details on the number of samples, type of sample containers, preservation of samples including temperature requirements, holding times, analytical methods, analytical detection and quantification limits for each parameter, type and number of quality assurance field samples, precision and accuracy requirements, sample preparation requirements, sample shipping methods, and laboratory data delivery requirements?	**Yes** If not, what is missing? N/A
7. [II.G.3.b)] Does the QA Plan include: description of flow measuring devices or methods used to measure influent and/or effluent flow at each point, calibration procedures, and calculations used to convert to flow units. If a permittee's facility has multiple effluent discharge points and/or influent points, it must describe its method of compositing samples from all points proportionally to their respective flows?	**No** *If not, what is missing?* The plan is missing calibration protocols for the mechanical flow meter. The operator will develop a plan to test the calibration of the flow meter and add the protocol into the QAP.
8. [II.G.3.b.] If you elected to take grab samples of influents, does the plan provide evidence of insignificant variability among influent sources?	**N/A**
9. [II.G.3.b.] If you elected to not monitor small discharges that comprise less than 1% of the total raceway flows, does the plan provide justification that effluent quality of these discharges is the same as monitored discharges?	**N/A**
10. [II.G.3.c.] Does the QA Plan include a map(s) of sampling points, including receiving water sampling locations and justification for the choice of the sampling?	**Yes**
11. [II.G.3.c.] Does the QA Plan have a location of the small discharges that comprise less than 1% of the total raceway flows?	**N/A**
12. [II.G.3.d.] Does the QA Plan include qualifications and trainings of personnel?	**No**
13. [II.G.3.e.] Does the QA Plan include the laboratory name and telephone number?	**Yes**
14. [II.G.5.] Are copies of the QA Plan kept on site and made available to EPA and DEQ upon request? If lack of suitable storage area makes on-site storage impossible, is the QA Plan kept in the possession of staff whenever they are working on-site?	**Yes** **N/A**
15. Is facility following / using the QA Plan?	**Yes**

BEST MANAGEMENT PRACTICES PLAN (BMP PLAN)	
Part III . According to Part III.B., the permittee must develop and implement a BMP Plan which meets the specific requirements listed in Part III.E.	
1. Do you have a BMP plan? If not on site, is it in the possession of staff when they are working on-site?	**Yes**

2. When did you submit the certification (Appendix F) that a plan has been developed?	Mr. Henderhan stated that the last BMP certification was submitted on 01/1/2017.

3. Chemical Storage a. ensure proper storage to prevent spills, b. implement procedures for proper containing, cleaning and disposing of spilled material.	 **Yes** **Yes**
4. Structural Maintenance a. routinely inspect rearing and holding units and waste collection containment to identify and promptly repair damage, How often? b. regularly conduct maintenance of rearing and holding units and waste collection and containment systems to ensure their proper function	 **Yes** **Daily** **Yes**
5. Training Requirements: a. Train personnel in spill prevention and clean-up and disposal of spilled materials. b. Train personnel on proper structural inspection and maintenance of rearing and holding units and waste collection and containment systems.	 **Yes** **Yes**
6. Operational Requirements: a. Water which is disinfected with chlorine or other chemicals must be treated before it is discharged to waters of the U.S. b. Treatment equipment used to control the discharge of floating, suspended or submerged matter must be cleaned and maintained at a frequency sufficient to prevent overflow or bypass of the treatment unit by floating, suspended, or submerged matter. c. Procedures must be implemented to prevent fish from entering quiescent zones, full-flow and off-line settling basins. Fish which have entered quiescent zones or basins must be removed as soon as practicable. d. All chemicals must be used in accordance with applicable label directions (FIFRA or FDA) f. Identify and implement procedures to collect, store, and dispose of wastes, such as biological wastes, in accordance with IDAPA §02.04.17 and IDAPA §58.01.02. Such wastes include processing solid wastes. g. Implement procedures to control the release of transgenic or non-native fish or their diseases as specified in any permit(s) issued by the Idaho Department of Fish and Game for the importation, transportation, release or sale of such species, in accordance with IDAPA §13.01.10.100. h. Implement procedures to eliminate the release of PCBs from any known sources in the facility, including paint, caulk, or feed	 **Yes** **Yes** **N/A** **Yes** **Yes** **Yes** **Yes**
When was the BMP Plan reviewed within the past year (III.D.)	**Yes** — 01/2/2018, Mr. Henderhan

and updated recently?	stated that the BMP plan updates are reviewed every year in January.

AQUACULTURE SPECIFIC REPORTING REQUIREMENTS (Part IV.)	
A. Structural Failure (see IV.A.) Remind the interviewee of this new requirement: Failure or damage to the facility must be reported to EPA and DEQ orally within 24 hours and in writing within five days when there is a resulting discharge of pollutants to waters of the U.S.	**Completed**
C. Chemical Spills (see IV.B.) Remind the interviewee of this new requirement: The permittee must monitor and report to EPA and DEQ any spills that result in a discharge to waters of the United States; these must be reported orally within 24 hours and in writing within five days.	**Completed**
D. Annual Report of Operations (see IV.C.) Remind the interviewee of this requirement: The permittee must prepare and submit an annual report of operations by January 20th of each year to EPA and DEQ.(see Appendix G)	**Completed**
1. Did you submit the last report as required?	**Yes** — Mr. Henderhan stated that he had submitted the last report as required on 01/08/2018.
2. Is the annual report complete? (Check the report against the required elements)	**Yes**
Ask to see the annual logs of production. 3. Are the logs consistent with what is reported in the annual report?	**Yes**
4. Was the facility able to provide all the required paper documentation requested?	**Yes**

FACILITY PHYSICAL INSPECTION – SITE INSPECTION	
Objectives of the facility inspection include: identifying all discharges to the surface waters from the facility; observing and recording prohibited discharges or practices; and noting any problems. Many of these questions are subjective.	
DISCHARGES	
Are there any unreported outfalls? (check observed against NOI)	**No**
If so, describe:	**N/A**
Photo (s) of receiving water(s), particularly documenting any of below:	**See Appendix A. Photograph 9.**
RECEIVING WATERS	
1. Any floating solids or visible foam in other than trace amounts?	No.
2. Any evidence of discharged sludge, grit or accumulated solid residues?	**No**
3. Any floating or suspended or submerged matter, including dead fish, in amounts causing nuisance or objectionable condition?	**No**
4. Location of the receiving water monitoring.	At discharge locations
Photo (s) of receiving water(s), particularly documenting any of the items below:	**See Appendix A. Photograph 9.**

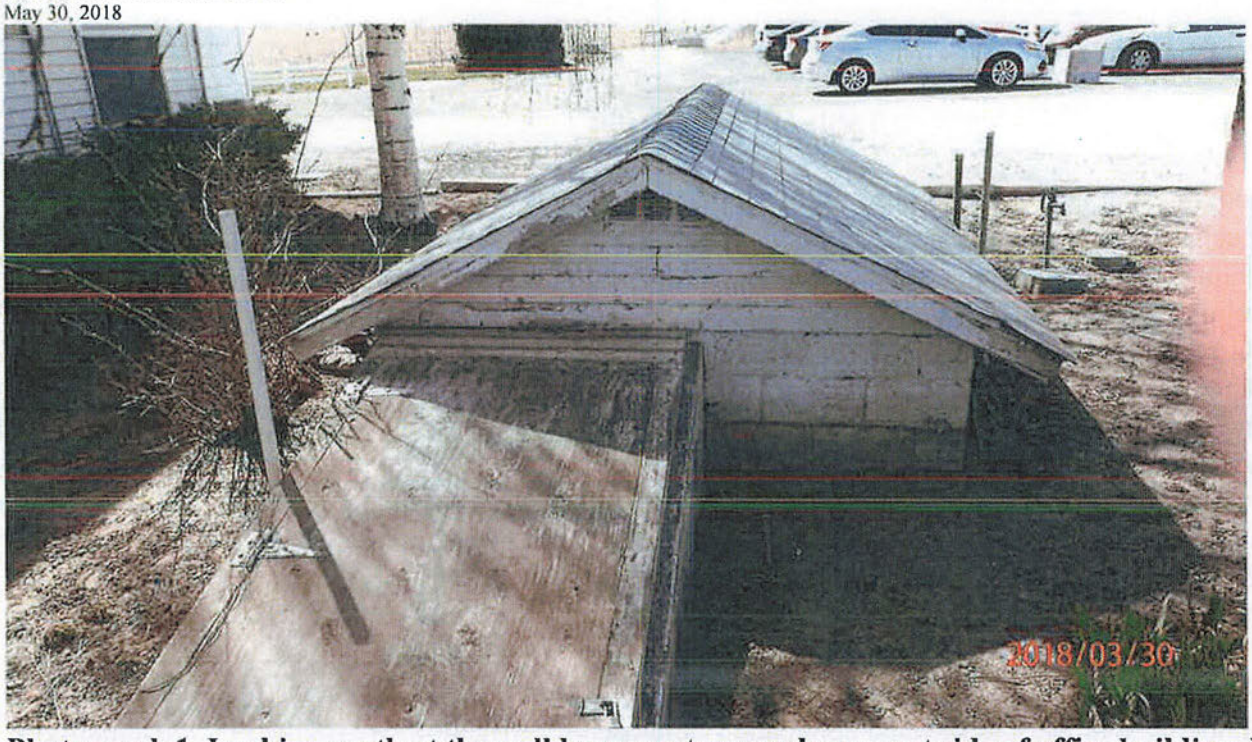
1. Any floating solids or visible foam in other than trace amounts?	**No**
2. Any evidence of discharged sludge, grit or accumulated solid residues?	**No**
3. Any floating or suspended or submerged matter, including dead fish, in amounts causing nuisance or objectionable condition?	**No**
FLOW MEASUREMENT DEVICE(S)	
1. Were flow measurements taken during inspection?	**No**
2. Location of flow measuring device for raceways:	A mechanical flow meter dial in maintenance shop prior to processing facility.
3. How are flow measurements taken?	By reading the mechanical flow meter dial in maintenance shop.
Photo (s) of taking flow measurement:	**N/A**
WATER TEMPERATURE MEASUREMENT	
1. Influent water Temp.	**Did not sample**
2. Effluent water Temp.	**Did not sample**
SAMPLING LOCATION & SAMPLING PREPARATION	
1. Are influent sample locations adequate?	**N/A**
2. Are effluent sample locations adequate?	**Yes**
3. Are receiving water sample locations adequate?	**Yes**
4. Are samples refrigerated / iced down after sampling?	**Yes**
5. Are samples iced down during transportation to contract Lab?	**Yes**
SOLIDS CONTAINMENT & STORAGE	
1. Is the solids disposal area adequate?	**Yes**
2. Removed solids prevented from reentry to navigable waters?	**Yes**
3. Does the facility land apply solids or irrigate with or apply wastewater?	Yes - Mr. Henderhan stated that all solids are composted on-site, and then trucked to a location away from the facility to DEQ approved agricultural lands for application. Irrigation from treated wastewater occurs on DEQ approved pasture grass lands in front of facility generally starting in March through October.
INSPECTION CONCLUSION DATA SHEET (ICDS) INFORMATION	
1. Did you observe deficiencies (potential violations) during the on-site inspection?	**No**
2. If so, did you communicate them to the facility during the inspection?	**N/A**
3. Did the facility or operator take any corrective actions	**N/A**
4. Did you provide general compliance assistance during the inspections?	**No**
5. Did you provide site-specific compliance assistance?	**No**

AREAS OF CONCERN
1. Part II.G.3.b of the permit states that "Flow measuring devices or methods used to measure influent and/or effluent flow at each point, calibration procedures, and calculations used to convert to flow units." My concern is that the QAP was missing a calibration procedure for mechanical flow meter.
2. Part II.B, Table 2, and Part II.E.1, Table 3, of the permit contain flow-dependent effluent limitations (i.e., BOD_5, TSS, TP, Oil & Grease, and Total Phosphorous) in lbs/day. My concern is that the mechanical Sensus flow meter had not been calibrated since installation at the time of the inspection, providing potential inaccurate monitoring results for these parameters.
3. Part II.G.3.d of the permit states "Qualification and training of personnel..." My concern is that the QAP was missing qualification and training of personal.

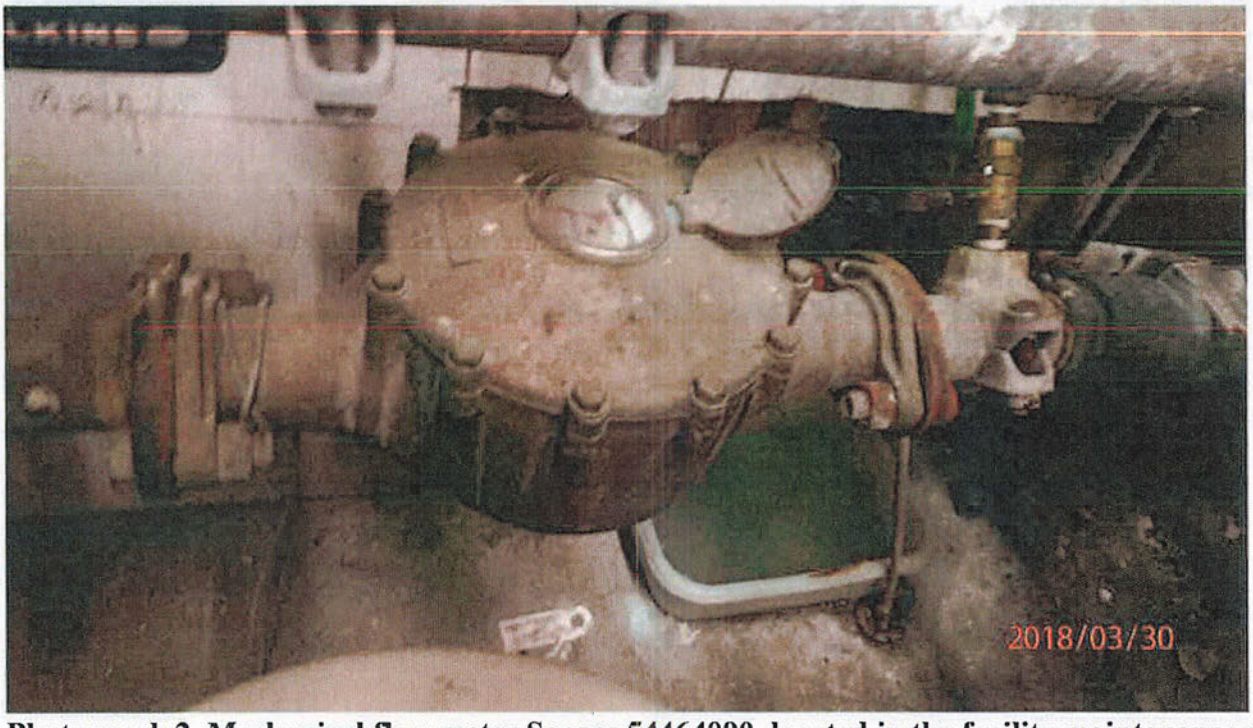
Appendix A. Photographic Documentation

Table of Photographs

Appendix B. Supporting Documents

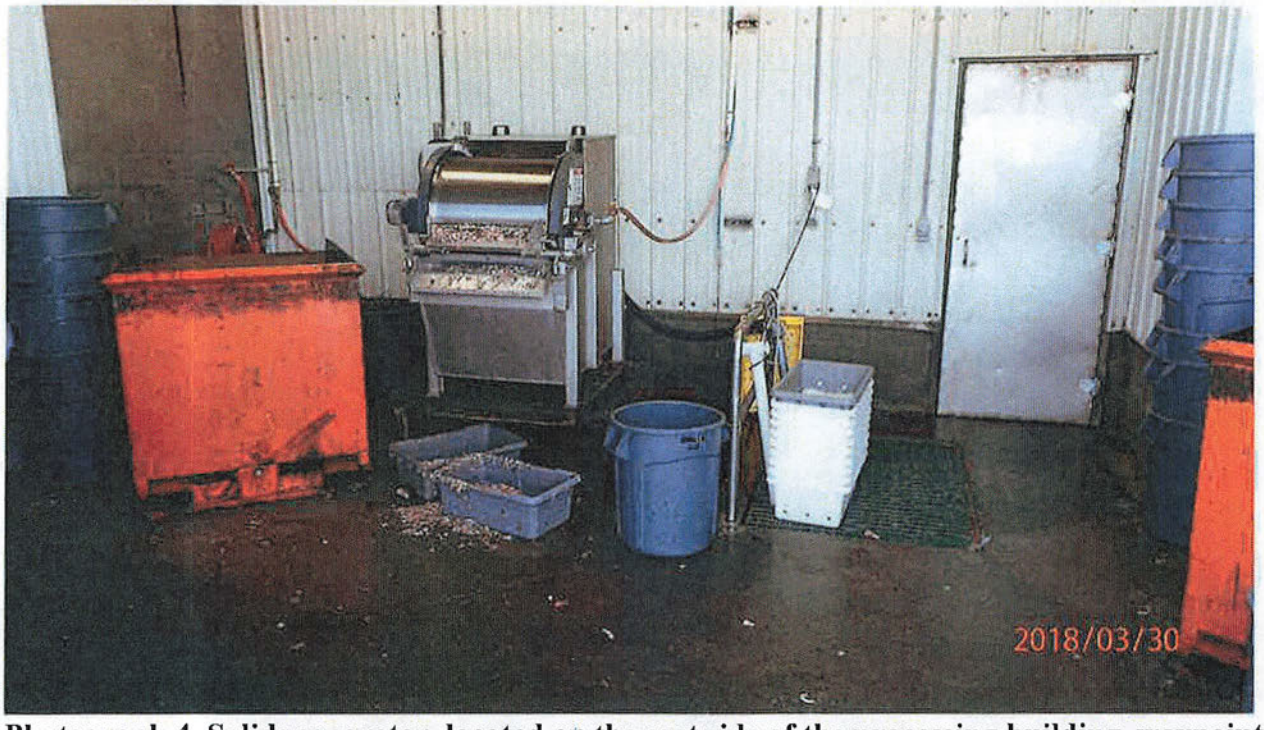


Photograph 1. Looking south at the well house water supply on west side of office building. Waypoint 26.



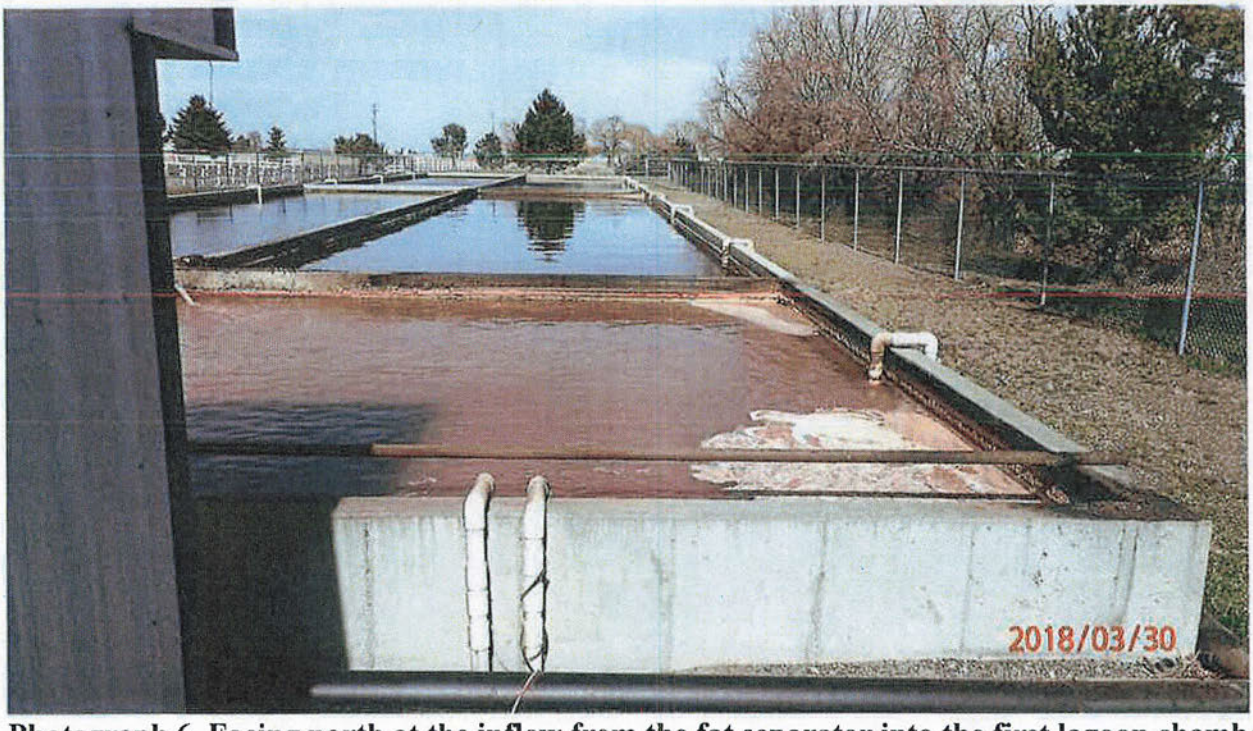
Photograph 2. Mechanical flow meter Sensus 54464090, located in the facility maintenance shop.

Photograph 3. Chlorine meter and chlorine pump in maintenance building by water flow meter.



Photograph 4. Solids separator, located on the east side of the processing building, waypoint 28.

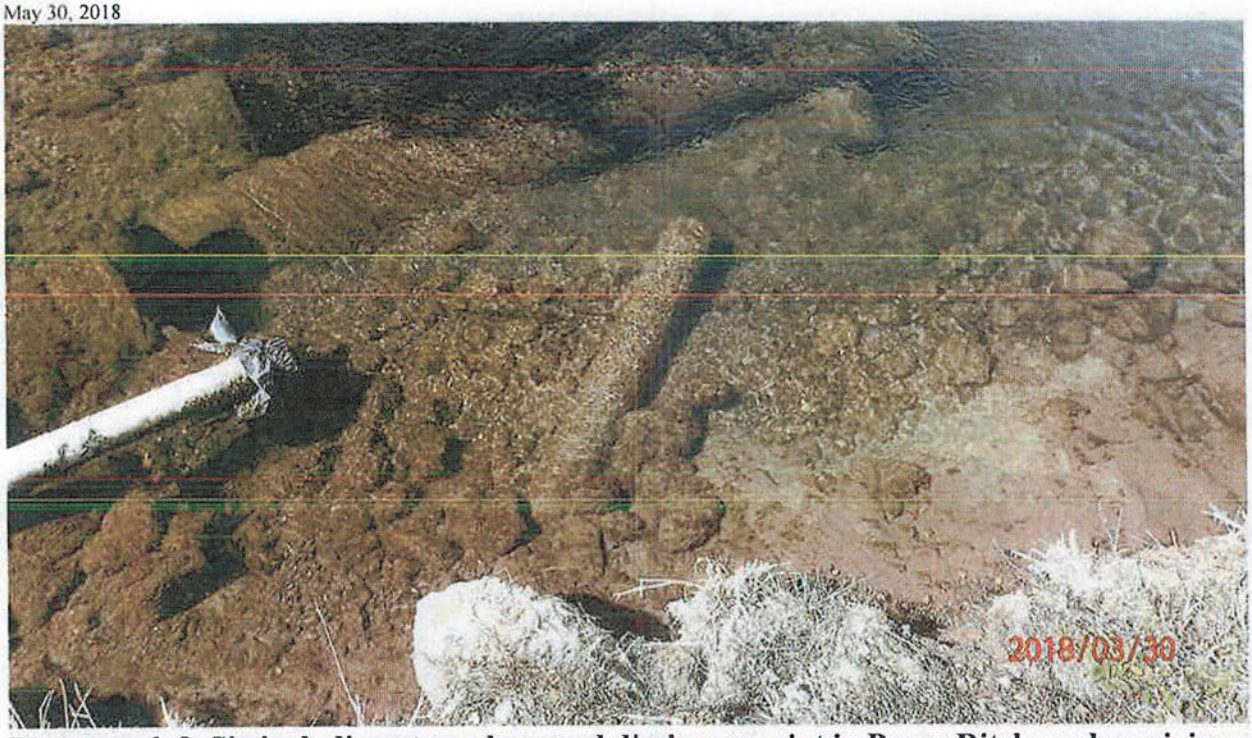
Photograph 5. Fat separator located downstream of the solids separator on the northeast corner of the processing building, waypoint 29.



Photograph 6. Facing north at the inflow from the fat separator into the first lagoon chamber, waypoint 30.

Photograph 7. Looking north with an overview of the lagoons from their southwest corner, waypoint 31.

Photograph 8. Discharge point and sampling location at the southwest end of the lagoon. Samples are taken from the inner portion of pipe. Waypoint 31.



Photograph 9. Six inch diameter submerged discharge point in Peavy Ditch, and receiving water quality monitoring location upstream of pipe, waypoint 32.

Photograph 10. Facility entrance sign for Evaqua Farms, Inc. facility, waypoint 32.

Photograph 11. Looking northwest at the land application field used for irrigation, waypoint 34.

Photograph 12. Looking southwest at the land application field used for irrigation, Waypoint 34.

Appendix B: Supporting Documents

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

OFFICE OF
WATER AND
WATERSHEDS

DEC - 9 2016

Reply To Attn Of: OWW-191

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Ms. Linda B. Jones
Holland & Hart LLP.
800 West Main Street, Suite 1750
Boise, ID 83702

Re: NPDES Nos. IDG130001, -130008, -130009, -130018, -130046, -132004, Permit Transfers

Dear Ms. Jones:

Thank you for your electronic mail, which the U.S. Environmental Protection Agency (EPA) received on December 1, 2016. Your letter confirmed the transfer of operator/permittee for the facilities referenced above, from SeaPac of Idaho, Inc. to Evaqua Farms LLC, effective January 1, 2017. We will record the transfer for our records. This letter serves as confirmation of Evaqua Farms permit coverage.

To avoid any misunderstanding, the Transfer Agreements covered each of the following facilities:

Permit No.	Facility
IDG130001	Idaho Springs Fish Hatchery
IDG130008	Blue Lakes Trout Farm
IDG130009	Magic Springs Hatchery
IDG130018	Pristine Springs Fish Hatchery
IDG130046	(currently) SeaPac of Idaho Hatchery
IDG132004	(currently) SeaPac of Idaho

If you have further questions, please contact Dirk Helder of the EPA Idaho Operations Office in Boise, at 208-378-5749.

Sincerely,

Michael J. Lidgard, Manager
NPDES Permits Unit

cc: Mr. Dirk Helder, USEPA, IOO
Mr. Rob Young, President of Evaqua Farms LLC
Mr. Ken Ashley, President of SeaPac of Idaho, Inc.

Figure 1. EPA letter confirming Evaqua Farms, Inc permit transfers.

Aquaculture Facility Inspection Report

Permit No.: IDG-132000
Page 58 of 62

Idaho Aquaculture

Quality Assurance Plan
(QA Plan)
Certification

Facility Name: Filer Processing Plant

NPDES Permit Number: IDG 132004

The QA Plan is complete and is available upon request to EPA and IDEQ.

The QA Plan is being implemented by trained employees.

The QA Plan has been reviewed and endorsed by the facility manager.

The individuals responsible for implementation of the QA Plan have been properly trained.

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Signature:	Title/Company:
Jim Henderhan	General Manager / Evaqua Farms LLC, a Delaware limited liability company
Print Name:	**Date:**
Jim Henderhan	1-1-17

An existing discharger must submit this certification within 90 days of the effective date of this permit. For a new permittee, this certification must be submitted no later than the written Notice of Intent to be covered under this permit. The certification must be submitted to EPA and to the responsible IDEQ office (§I.C.1 of the permit).

Figure 2. Evaqua Farms, Inc. QAP certification

Permit No.: IDG-132000
Page 57 of 62

Idaho Aquaculture

Best Management Practices Plan

(BMP Plan)

Certification

Facility Name: Filer Processing Plant

NPDES Permit Number: IDG 132004

The BMP Plan is complete and is available upon request to EPA and IDEQ.

The BMP Plan is being implemented by trained employees.

The BMP Plan has been reviewed and endorsed by the facility manager.

The individuals responsible for implementation of the BMP Plan have been properly trained.

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Signature:	Title/Company: General Manager / Evaqua Farms LLC, a Delaware limited liability company
Print Name: Jim Henderhan	Date: 1-1-17

An existing discharger must submit this certification within 90 days of the effective date of this permit. For a new permittee, this certification must be submitted no later than the written Notice of Intent to be covered under this permit. The certification must be submitted to EPA and to the responsible IDEQ office (§I.C.1 of the permit).

Figure 3. Evaqua Farms, Inc. BMP certification.

Evaqua Farm LLC
Filer, Idaho Facility
Wastewater Treatment Bio-solids Utilization Plan

Accumulation of excess solids in the final settling chamber of Evaqua Farms wastewater treatment facility will inhibit further settling and lead to highly anaerobic conditions which will emit undesirable odors. Evaqua Farms recirculates these solids through the treatment facility to provide fresh bacterial culture for increased organic degradation of influent, but at times solids are required to be harvested from the system. The solids, primarily composed of microscopic organisms, bio-organics, and inert solids, can be utilized for soil augmentation of the fields on Evaqua Farms property. Appropriate application of biosolids will reduce requirements for commercially produced fertilizers, and reduce total solids wasted to the waters of the United States. This document will serve as Evaqua Farms guideline for evaluating, harvesting and safely land applying biosolids generated in our wastewater treatment facility.

Wastewater Treatment of Biosolids:
Biosolids for land application are generated from Evaqua's wastewater treatment facility. The facility is designed to reduce nutrients and suspended solids from fish processing and fish rearing activities. This treatment facility does not treat waste from warm-blooded animals or human septage. Influent waste includes screened fish processing water, processing plant cleaning water, fish manure, settled silt, unconsumed fish feed, aquatic plants and organisms growing on the rearing and holding surfaces. None of the influent wastes harbor or are vectors of human pathogens. The resultant solids after treatment are protists, bacteria, organic compounds and inert material. These solids accumulate in the final conical settling chamber while the liquid portion is discharged to the waters of the United States under our NPDES permit.

Site Selection:
Evaqua Farms will land apply these biosolids to adjacent land on Evaqua Farms property. The fields on Evaqua Farms property are landscaped for aesthetic value and also crop production. The wastewater treatment manager has determined that the lands for biosolids application minimize the risks of run-off, groundwater contamination, aesthetic degradation of the neighborhood and constituent overload.

Soil Description:
The lands determined suitable for biosolids application consist of portneuf loam type A. Topsoil depth in the areas for biosolids application varies from 18 inches to 30 inches. The soil has good capacity for nutrient and moisture retention.

Geological Features:
Biosolids application areas contain no exposed bedrock. The ground slopes less than 1% to the north preventing runoff to adjacent waters or uncultivated areas.

Figure 4. Page 1 of Evaqua Farms, Inc. Wastewater Treatment Bio-solids Utilization Plan

Groundwater Characteristics:
Groundwater as measured by the well at the facility is below 50 feet (well depth 69 feet). There are no natural springs in the immediate area. Application area is 100 feet or more from the existing wellhead used for the plant water supply.

Surrounding Land Use:
The areas determined suitable for application are surrounded on all sides by agricultural pursuits. The closest residences to areas of application are greater than 250 feet away. Run-off from lands bordering application sites is inhibited by irrigation ditches and canals.

Topography:
As stated, application sites have less than a 1% slope. The sites will be under constant cultivation with grass, landscape vegetation or agriculture crops to prevent run off of liquid. Irrigation ditches and canals border the areas of application, but if potential run-off locations are identified they will be directed away by artificial earthen berms as required. The application area is in no known flood plain.

Climate:
The application area is in the southern Idaho desert. Average precipitation for the region is 9 inches per year. Application of biosolids will occur during the frost free days typically between April 1st and October 31st and when the ground is not saturated to prevent run-off and leaching.

Description of the Application Process:
Biosolids will collect in the conical settling chamber or the waste treatment facility. When biosolids reach three or more feet and a determination is made by the wastewater treatment manger that recirculation is not required, the solids will be harvested off the bottom through an in-place pipe to collection sump. The slurry may be mixed at an approximate 1 to 10 ratio with the irrigation water from the Twin Falls Canal Company at the field application sites for sprinkler dispersal. Water from the clarifier may also be pumped onto the selected ground without mixing depending on the viscosity or solids make-up of the discharge.

Procedures to Prevent Reduction of Soil Productivity or Percolation of Excess Nutrients:
The amount of solids removed at any one time will be small compared to the amount of land for application. At a slurry depth of three feet in the final chamber, the volume of dry solids for application is approximately 26 cubic feet (130 CU FT slurry at 20% solids by weight) or 1 cubic yard dry. These solids are to be applied over an area of up to 15 acres with over 100 additional acres held in reserve for future needs. Sprinkler application will evenly distribute the solids over the application area preventing excess build-up or gradient application. Since the application area will be under constant cultivation during application, the solids will be allowed to dry on the surface (no tilling) reducing the amount of nitrogen that enters the soil. Multiple application at frequent intervals may be employed as means of general field watering when solids content of the slurry is low.

Figure 5. Page 2 of Evaqua Farms, Inc. Wastewater Treatment Bio-solids Utilization Plan.

Adverse Health Effects:
Biosolids from the waste treatment lagoon present no threat to human health. The treatment facility is solely used for processing wastes associated with trout production and processing. No human septage of waste from warm blooded mammals enters the treatment facility. The application of the biosolids to landscaped or cultivated fields has no vector or human health risks.

Characteristics of Slurry:
An estimated 130 cubic feet of slurry will be harvested from the treatment facility at one land application event. The interval of harvest has not been ascertained and shall be dependent upon production and requirement of biosolids recirculation. Land application of heavy settled solids should be limited to twice yearly per estimates but may be substantially less or more. General irrigation with the treatment lagoon water may be frequently applied but, this does not constitute the settled slurry, rather the discharge that would normally exist in the lagoon as treated water. The amount of nutrients, but extrapolated data suggests the concentration will be much lower than those experienced with municipal sludge or cow manure.

Records:
Analysis records, date of harvest and volume of harvest, will be kept indefinitely at the Evaqua Farms facility for each slurry harvest event and analysis.

Application of the biosolids to Evaqua Farms property is the most environmentally sound utilization of this waste stream. It is Evaqua Farms policy to ensure that the biosolids application will prevent degradation to the environment or adverse health effects. Following the procedures set forth, Evaqua Farms will accomplish these goals.

Figure 6. Page 3 of Evaqua Farms, Inc. Wastewater Treatment Bio-solids Utilization Plan.

IdaSea®

"Genuine Idaho"

Dr. Sonny Buhidar
Division of Environmental Quality
Twin Falls Regional Office
650 Addison Avenue West
Suite 110
Twin Falls, Idaho 83301

December 8, 2016

Dr. Sonny Buhidar

RE: Wastewater Treatment Biosolids Application Plan

This correspondence is to give the Department of Environmental Quality notice that SeaPac of Idaho, Inc. will be ceasing operation of the fish processing facility at 4074 N. 2000 E. Filer, Idaho 83328 on December 31, 2016. Evaqua Farms LLC. will be assuming operation of this facility effective January 1, 2017. Evaqua Farms LLC. will be assuming all operational aspects of the processing plant to include managing the Wastewater Treatment Biosolids Utilization Plan under the same guidelines as approved by the Division of Environmental Quality on January 11, 2000.

Signatures below confirm agreement to the transfer of plant operational responsibilities:

Ken Ashley as President for SeaPac of Idaho, Inc.

Dated: 12/8/2016

Jim Henderhan as General Manager for Evaqua Farms LLC.

Dated: 12-8-16

SeaPac of Idaho
P.O. Box 546 • Buhl, Idaho 83316
(208) 326-3100 • Fax (208) 326-5935

Figure 7. Letter from SeaPac of Idaho transferring all operational aspects of the processing plant to include managing the Wastewater Treatment Bio-solids Utilization Plan under the same guidelines as approved by DEQ on January 11, 2000.

STATE OF IDAHO
DIVISION OF
ENVIRONMENTAL QUALITY

601 Pole Line Road, Suite 2 • Twin Falls, Idaho 83301-3035 • (208) 736-2190

Dirk Kempthorne, Governor
C. Stephen Allred, Administrator

January 11, 2000

Mr. Ken Ashley
SeaPac of Idaho
P.O. Box 546
Buhl, ID 83316

Re: Wastewater Treatment Biosolids Utilization Plan

Dear Kent:

We have reviewed the above referenced wastewater land application plan and based upon information submitted and the current wastewater sludge generation rates, the Idaho Division of Environmental Quality approves the biosolids application plan based on the following terms and conditions:

1. Public access to the land application site must be restricted by means of fencing or gating of the property.

2. Application rates must be administered so as to minimize nuisance conditions including odors and vectors.

3. DEQ will conduct an annual review and site inspection to determine compliance with the terms and conditions of the plan approval.

Please feel free to contact me or Mike McMasters if you have any questions or comments, 736-2190.

Sincerely,

Nick A. Cizmich
Water Quality Science Officer

NAC/ml
cc: Mike McMasters, Regional Manager-Engineering, DEQ, TFRO
Mike Cook, Wastewater Land Application, DEQ State Office, Boise

H:\LETTERS\NICK\BIOSOLID.WPD

Figure 8. DEQ letter from January 11, 2000 approving the then SeaPac of Idaho Wastewater Land Application Plan.

Aquaculture Facility Inspection Report